

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

**TO: THE UNITED STATES DISTRICT COURT:**

Defendant, Sysco Columbia, LLC, would respectfully show the Court in support of its Notice of Removal that:

1. The Summons and Complaint in this action were filed on February 16, 2021 in the Court of Common Pleas for Greenville County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendant in this action and service was affected on March 23, 2021. Therefore, removal is timely under 28 U.S.C. §1446(b).

2. The United States District Court has jurisdiction over this action pursuant to 28  
U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina; Defendant  
Sysco Columbia, LLC is incorporated in the State of Delaware and its sole member is domiciled  
outside of the State of South Carolina. The action has been brought by the Plaintiff against the  
Defendant for the alleged accident which occurred in Greenville County, South Carolina.

3.       Venue is proper in this matter in the Greenville Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff allegedly suffered pain and suffering, mental anguish, impairment of health and physical condition, loss of enjoyment of life, lost wages, medical expenses, which, according to Paragraph 16 of the Plaintiff's complaint (attached hereto as Exhibit A) amounts to "a sum equal to or greater than \$100,000.00."

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Greenville County.

Respectfully submitted,

**SWEENEY, WINGATE & BARROW, P.A.**

s/ Mark S. Barrow

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**ATTORNEYS FOR THE DEFENDANT**

Columbia, South Carolina

April 16, 2021